

1 THE HONORABLE MARSHA J. PECHMAN
2
3
4
5
6
7

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

KATHY BARR,

Plaintiff,

v.

C&D ZODIAC, INC., a Delaware corporation registered in Washington and doing business in Washington State; SAFRAN USA, INC., a Delaware corporation registered in Washington and doing business in Washington State; ZODIAC CABIN & STRUCTURES, LLC, a Delaware limited liability company registered in Washington and doing business in Washington State,

Defendants.

No. 2:18-cv-00344

STIPULATION AND ORDER FOR DISMISSAL AS TO DEFENDANTS ZODIAC CABIN & STRUCTURES SUPPORT LLC AND SAFRAN USA, INC.

NOTE ON MOTION CALENDAR:

March 15, 2018

Plaintiff Kathy Barr and defendants C&D Zodiac, Inc. and Zodiac Cabin & Structures Support LLC (erroneously sued by Plaintiff as "ZODIAC CABIN & STRUCTURES, LLC") stipulate and agree, pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), to the dismissal of all claims by plaintiff Kathy Barr against defendant Zodiac Cabin & Structures Support LLC and defendant Safran USA, Inc., without costs to any party. This Stipulation is signed by all parties who have appeared. Safran USA, Inc. has not appeared in this action. Voluntary dismissal of all claims against one or more defendants is proper under Rule 41. See *Gen. Signal Corp. v. MCI Telecommc'ns Corp.*, 66 F.3d 1500, 1513 (9th Cir. 1995) ("Rule 41 is reserved for

STIPULATION & ORDER DISMISSING
ZODIAC CABIN AND SAFRAN
(No. 2:18-cv-00344) -1

circumstances in which the result of the alleged dismissal is that one or all of the defendants are released from the action.”), cert. denied, 516 U.S. 1146 (1996).

RESPECTFULLY SUBMITTED this 15th day of March, 2018.

s/ Richard Hughes, WSBA No. 22897
Hughes Law Group, PLLC
415 N. 4th Street
Mount Vernon, WA 98273
Telephone: 360.336.6120
E-mail: richard@hughes-law-group.com

Attorneys for Plaintiff Kathy Barr

s/ Julie S. Lucht, WSBA No. 31278
Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Telephone: 206.359.8000
Facsimile: 206.359.9000
Email: JLucht@perkinscoie.com

Attorneys for Defendant C&D Zodiac, Inc. and
Zodiac Cabin & Structures Support LLC

ORDER

Having reviewed the stipulation, it is so ordered.

DATED this 27th day of March, 2018.

Marsha J. Pechman
United States District Judge

**STIPULATION & PROPOSED ORDER
DISMISSAL ZODIAC CABIN AND SAFRAN
(No. 2:18-cv-00344) -2**

Perkins Coie LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101-3099
Phone: 206.359.8000
Fax: 206.359.9000

1

CERTIFICATE OF SERVICE

2 On March 15, 2018, I caused to be served upon counsel of record, at the addresses stated
3 below, via the method of service indicated, a true and correct copy of the foregoing document.

4

5 Richard Hughes, WSBA #22897	<input type="checkbox"/>	Via Hand Delivery
6 Hughes Law Group, PLLC	<input type="checkbox"/>	Via U.S. Mail, 1st Class, Postage Prepaid
7 415 N. 4 th Street	<input type="checkbox"/>	Via Overnight Delivery
8 Mount Vernon, WA 98273	<input type="checkbox"/>	Via Facsimile
Telephone: (206) 336-6120	<input checked="" type="checkbox"/>	Via E-Filing
Email: Richard@hughes-law-group.com	<input checked="" type="checkbox"/>	Via E-mail

9 Attorneys for Plaintiff Kathy Barr

10 I certify under penalty of perjury under the laws of the State of Washington that the
11 foregoing is true and correct.

12 DATED this 15th day of March, 2018.

13

14 *s/ Janet Davenport*
Janet Davenport, Legal Practice Assistant

15
16
17
18
19
20
21
22
23
24
25
26

CERTIFICATE OF SERVICE (No. 2:18-cv-00344) -1